

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JASON DISISTO,

Plaintiff,

-against-

Defendant Police Officer
Florez' Initial Disclosures

15 CV 3296(GHW)

THE CITY OF NEW YORK, New York City
Police Department ("NYPD") Officer ("P.O.")
JONATHAN MUNOZ (Shield No. 20918),
EDWIN FLOREZ (Shield No. 22262) and P.O.
DANIEL CROSS, (Shield No. 2635) in their
Individual capacities,

Defendants.
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Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant New York
City Police Officer EDWIN FLOREZ submits:

A. The following individual likely to have discoverable information relevant to dispute
facts alleged in the pleadings:

1. The parties to this action.
2. Non-Party Witness: Defendant New York City Police Officer EDWIN FLOREZ
reserves his right to supplement these initial disclosures should potential non-party witnesses be
discovered.
3. Defendant New York City Police Officer EDWIN FLOREZ reserves his right to
supplement these initial disclosures of any potential witnesses that are discovered.

B. At present, Defendant New York City Police Officer EDWIN FLOREZ has within his
care, custody or control the following documents, data compilations or tangible things relevant to
dispute the facts alleged in the pleadings:

1. Officer FLOREZ is presently searching for his Memo Books containing an entry for the date of the incident giving rise to this action. Upon possession of said Memo Book entry, a copy will be forwarded.

2. Any and all other documents are in the care, custody and control of the municipal defendant.

C. Officer EDWIN FLOREZ is not aware of any insurance agreement applicable to this action at this time. He has asserted cross-claims against the City of New York pursuant to New York State General Municipal Law § 50-k seeking his right to a statutory defense and indemnification in the event of a judgment.

Dated: New York, New York
December 8, 2015

Yours, etc.

_____/s/_____
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